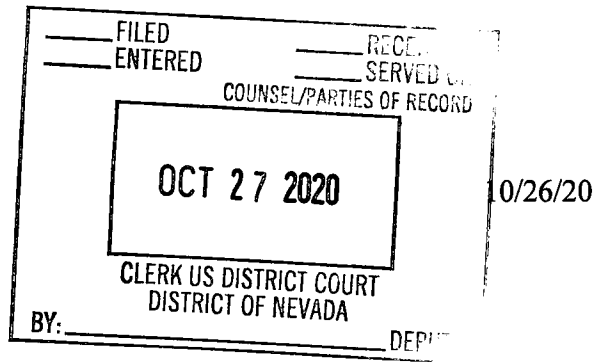


From  
 Dr. Lakshmi Arunachalam  
 Self-Represented Plaintiff  
 222 Stanford Avenue  
 Menlo Park, CA 94025  
 650 690 0995  
[Laks22002@yahoo.com](mailto:Laks22002@yahoo.com)



**U.S. DISTRICT COURT FOR DISTRICT OF NEVADA**

<p><b>Dr. Lakshmi Arunachalam</b>  <b>Plaintiff</b>          v.  <b>CSAA Insurance Group</b>  <b>Defendant</b></p>	<p><b>Case No. 2:20-cv-01558-RFB-VCF</b></p> <p><b>MOTION FOR RECONSIDERATION OF          IFP MOTION, IN RESPONSE TO          ORDER ECF 6 DATED 10/16/20</b></p>
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I, Dr. Lakshmi Arunachalam, respectfully request the Court to grant me my Motion for Reconsideration for IFP Motion in response to the Court's Order ECF 6 dated 10/16/20.

The Court appears to need clarification on some points that the Court has raised, and has made improper assumptions and has erroneously ruled against the IFP Motion. The Court's findings that "plaintiff's sworn affidavit is evasive and incomplete" is completely Erroneous. There are no "factual conflicts." Dr. Arunachalam, hereby, files her Objections to the Magistrate Judges Order ECF 6, **which is an Erroneous Decision made on the basis of faulty assumptions and extrapolations made by the Court without any basis.** Dr. Arunachalam clarifies for the Court the issues the Court has raised:

1. Dr. Arunachalam has left the section on wages blank, **because she receives no wages, as she has accurately stated in her affidavit.** **There is nothing "evasive and incomplete,"** as the Court has incorrectly extrapolated.
2. While having entered into multiple patent licensing agreements, those were not for recurring royalties, but one-time payments. Those monies have been improperly withheld by her

former lawyer who collected the monies from settlements with the defendants and **not returned to date to Dr. Arunachalam.** Dr. Arunachalam's lawsuit against him is still pending. Furthermore, Microsoft and SAP and other defendants harassed Dr. Arunachalam with 18 re-exams at the PTAB in IPRs and CBMs. Dr. Arunachalam had to pay patent lawyers to do that re-exam work and also pay patent maintenance fees. This has depleted her funds. **Dr. Arunachalam does not receive any monies or income currently from those licensing arrangements, that were one-time payments over 7 years ago, not recurring royalties.** Dr. Arunachalam's affidavit is accurate. There is nothing "evasive and incomplete."

3. Dr. Arunachalam has never been required to list her patents in any of her IFP Motions. It is clear Dr. Arunachalam is the inventor and assignee of 11 patents, which is why she has filed for patent infringement. If there is new or any revenue from the patents, surely that would be listed under "Wages" or "Income" or "Other Income," but there has been none. Dr. Arunachalam's affidavit is accurate. There is nothing "evasive and incomplete."

4. Dr. Arunachalam has correctly listed that her Mercedes Benz is almost 21 years old and is worth \$400, by Kelly Blue Book. Dr. Arunachalam's affidavit is accurate. There is nothing "evasive and incomplete."

5. Dr. Arunachalam correctly stated that she has a Ph.D. in Electrical Engineering, and that she is 72 years old and disabled. Dr. Arunachalam barely has time to breathe as she has had to work self-represented in her over 100 cases in District and Appellate Courts and the Supreme Court, in which **she has been denied her day in Court in over 100 Cases without a hearing in the greatest abuse of process by the Courts, Judges and Clerks of the Courts, in process disorder and neglect, constituting prejudice of good order and justice** and discredits the Judiciary by advocating treason against the Law of the Land. The District Courts sua sponte

dismissed Petitioner's patent infringement case, without a hearing in unfettered judicial misfeasance to the prejudice of ensuring a fair and proper administration of justice. Judge Andrews admitted to buying common stock in JPMorgan, a litigant in Dr. Arunachalam's cases, lost subject matter jurisdiction, and failed to recuse in all of Dr. Arunachalam's cases, making his Orders void. Non-compliance by the Courts with procedural rules is unlawful command influence. The Courts failed to abide by the Law of the Land as declared by Chief Justice Marshall in *Fletcher v. Peck* (1810), *Dartmouth College* (1819), *Grant v. Raymond* (1832) and other affirmations thereof, and violated the Contract Clause and Separation of Powers Clause of the Constitution. What can be more egregious than treason, sedition and Insurrection!

6. This case involves the largest heist and theft of intellectual property in the history of the United States. Dr. Arunachalam is the inventor of the Internet of Things (IoT) — Web Apps displayed on a Web browser and Corporate Infringers have unjustly enriched themselves of trillions of dollars without paying Dr. Arunachalam her royalties. The nation is able to function remotely during COVID because of Dr. Arunachalam's patented inventions, such as Zoom, Instacart, Web banking, Web healthcare applications, and much much more. This case is constitutionally more significant than *Marbury v. Madison* and more egregious than *Brown v. Board of Education*.

7. See ALP VOL. 12. CONST. LAW, CH. VII, SEC. 1, §141. With respect to **Fundamental, Substantive, and Due Process Itself:**

"... denies a litigant due process entitlement to an honest, though not learned tribunal; and if injured by ... the court is entitled to redress." [ALP VOL. 12. CONST. LAW, CH. VII, SEC. 1, § 140];

"and final decisions upon the **ultimate question of due process** cannot be conclusively codified to .... Any attempt to do this whether by direct denial of access to the courts upon this question of due process by hindering access to the courts or making resort to the courts upon it difficult, expensive,

**hazardous, all alike violate the Constitutional provision.**" [ALP VOL. 12. CONST. LAW, CH. VII, SEC. 1, §141].

**Wherefore,** Dr. Arunachalam prays that the Court grant her the IFP Motion and reconsider its decision in its Order **ECF 6**. A Certificate of Service is attached.

Date: 10/26/20

Respectfully Submitted,



Dr. Lakshmi Arunachalam  
222 Stanford Ave, Menlo Park, CA 94025  
650 690 0995; [laks22002@yahoo.com](mailto:laks22002@yahoo.com)

**CERTIFICATE OF MAILING AND SERVICE**

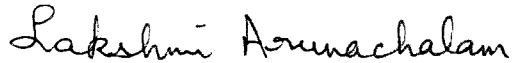
I, Dr. Lakshmi Arunachalam, hereby certify that on October 26, 2020, I filed an original of the attached "MOTION FOR RECONSIDERATION OF IFP MOTION, IN RESPONSE TO ORDER ECF 6 DATED 10/16/20," with the Clerk of the Court, U.S. District Court for the District of Nevada by sending it to Parcels Inc of Wilmington Delaware to deliver it via Fedex by Overnight for filing and docketing in this case to:

Clerk of Court  
U.S. District Court for the District of Nevada,  
333 S. Las Vegas Blvd., Las Vegas, NV 89101; Tel: 702.464.5400

I further certify that I served the Defendant via USPS of the same on the same day 10/26/20 to the following address:

Michael Zukerman, General Counsel, and Thomas M. Troy, CEO,  
**CSAA Insurance Group,**  
Corporate Headquarters, 3055 Oak Road, Walnut Creek, CA 94597;  
Tel: 925.279.2300.

Respectfully submitted



DATED: October 26, 2020

Dr. Lakshmi Arunachalam  
222 Stanford Avenue  
Menlo Park, CA 94025  
650 690 0995  
laks22002@yahoo.com

Align top of FedEx Express® shipping label here.

ORIGIN ID:ZWIA (302) 427-3908  
PARCELS  
PARCELS  
290 NORTH MARKET STREET

WILMINGTON, DE 19801  
UNITED STATES US

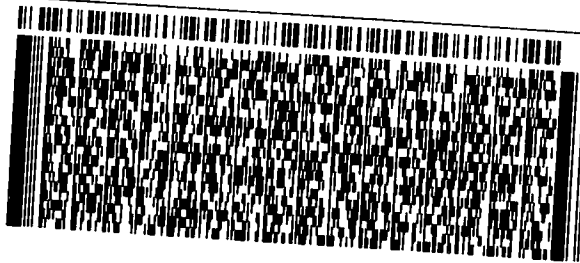
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TO **CLERK OF COURT  
U.S. DISTRICT COURT  
FOR DISTRICT OF NEVADA  
333 S. LAS VEGAS BLVD.  
LAS VEGAS NV 89101**

PO: 685744

REF: CSAA



**FedEx**  
Express



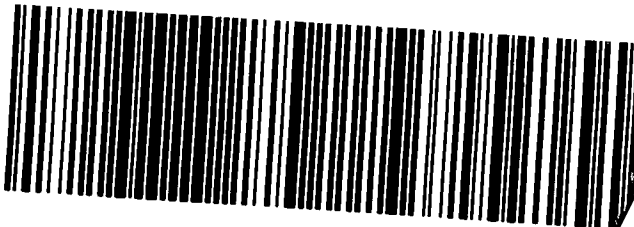
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**TUE - 27 OCT 10:30A  
PRIORITY OVERNIGHT**

**XX VGTA**

**89101  
NV-US LAS**



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